

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
	:
ANDREW C. SANKIN,	:
	:
Plaintiff,	:
	:
- v. -	:
	:
MARK ABESHOUSE and	:
RHONDA LEONARD,	:
	:
Defendants.	:
	:
-----X	

**RHONDA LEONARD'S  
NOTICE OF MOTION  
TO DISMISS THE COMPLAINT**

07 CV 10491 (CLB)(LMS)

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and the exhibits attached to the declaration of Charles A. Stewart, III, attorney for co-defendant Mark Abeshouse, filed on January 11, 2008, defendant, Rhonda Leonard, by her undersigned counsel, will move this Court on March 7, 2008 at 10:00 a.m. at the United States Courthouse, 300 Quarropas Street, Courtroom 218, White Plains, New York 10601, for an Order granting

(1) Rhonda Leonard's motion to dismiss the complaint of plaintiff Andrew C. Sankin with prejudice for failing to state a claim pursuant to Federal Rule of Civil Procedure 12(b)(6), and

(2) such other relief as this Court deems just and appropriate.

PLEASE TAKE FURTHER NOTICE that, pursuant to the stipulation and order filed on November 30, 2007, any opposition papers to the motion to dismiss from the plaintiff,

Andrew C. Sankin, should be filed on or before February 11, 2008, with replies thereto to be filed on or before February 25, 2008.

Dated: January 11, 2008  
New York, New York

Respectfully submitted,

LAW OFFICE OF  
RICHARD E. SIGNORELLI

By:



Richard E. Signorelli (RS-7976)

799 Broadway, Suite 539

New York, NY 10003

Telephone: 212 254 4218

Facsimile: 212 254 1396

rsignorelli@nycLITIGATOR.com<sup>SM</sup>

www.nycLITIGATOR.com<sup>SM</sup>

Attorneys for Defendant Rhonda Leonard

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